



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**  
REGION 8, MONTANA OFFICE  
FEDERAL BUILDING, 10 West 15<sup>th</sup> St, Suite 3200  
HELENA, MONTANA 59626

Ref: 8MO

July 14, 2009

Ms. Mary C. Erickson, Acting Forest Supervisor  
Custer National Forest  
1310 Main Street  
Billings, MT 59105

Re: CEQ 20090202; Ashland Ranger District Travel  
Management Plan FEIS and ROD

Dear Ms. Erickson:

The Environmental Protection Agency (EPA) Region VIII Montana Office has reviewed the Ashland Ranger District Travel Management Plan, Final Environmental Impact Statement (FEIS) and Record of Decision (ROD) in accordance with EPA responsibilities under the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act.

We appreciate receipt of responses to EPA's DEIS comments in Chapter 5 of the FEIS. We support the Custer National Forest's selection of Alternative B as the preferred alternative. Alternative B includes more environmentally protective features than the other two alternatives evaluated, no action and Alternative A (i.e., protection of streams, water quality, fisheries, wildlife, etc.). Alternative B would have the highest potential reduction in miles of road with reduced water quality/fisheries risk (187 miles vs. 66 miles with Alternative A and 0 miles under no action); reduces impacts to two sensitive aquatic species over Alternative A and no action; has lowest mileage of roads with moderate or high erosion hazard (560 miles vs. 736 miles with Alternative A and 667 miles with no action); lowest weed susceptible acres within the designated road corridor (48,138 acres vs. 62,717 acres with Alternative A and 57,706 acres with no action); and reduces the miles of roads designated for public motorized use more than other alternatives. We also appreciate inclusion of a discussion of wetlands in the FEIS, and are pleased that the District Ranger will develop an implementation and effectiveness monitoring plan within one year of the date of the decision for this project.

We do want to indicate that we remain concerned about the minimal funding and resources available to properly maintain roads and keep them in fair to good condition to minimize erosion and water quality and fisheries impacts. Only a small percentage of roads on the District receive annual maintenance, and the FEIS states that funding for maintenance of roads and trails is not anticipated to change significantly in the next 10 years. Accordingly, we remain concerned that there is insufficient funding to maintain all of the routes necessary for the administration, utilization, and protection of the District for the foreseeable future.

We believe it is important to provide adequate funding to properly maintain roads and to implement BMPs needed to address water quality effects of roads. There should be a continuing road inspection, evaluation and maintenance program in place to identify road drainage and BMP needs, and adequate funds to correct road deficiencies. We encourage provision of improved funding for road maintenance, and emphasize the need for decommissioning of roads which cause resource damages and which cannot be adequately maintained. We believe road networks should be limited to those that are necessary for access and management, and which can be adequately maintained within agency budgets and capabilities. This is the only way to protect and sustain resources and ecosystems for use by future generations given a situation with inadequate funding to maintain the road/trail system.

We also want to state that policing and enforcement of travel restrictions is necessary to promote compliance, and ensure protection of water quality, fisheries, wildlife, and other sensitive resources. While we agree that having understandable travel maps (Motor Vehicle Use Map, MVUM), and clearer travel management rules for the public will improve voluntary compliance with the travel plan, we believe it is also important, however, that adequate resources be devoted to policing and enforcement to assure compliance with travel management rules.

The FEIS states that enforcement is a national priority, however, provision of insufficient funding for enforcement is inconsistent with this statement. We believe there is a need for additional funding for enforcement to handle the increases in motor vehicle uses that are occurring on the District.

We thank for the opportunity to review and provide comments on the Travel Management Plan and EIS during the NEPA process. If you have any questions regarding our input please contact Mr. Stephen Potts of my staff in Helena at (406) 457-5022 or in Missoula at (406) 329-3313, or via e-mail at [potts.stephen@epa.gov](mailto:potts.stephen@epa.gov).

Sincerely,

John F. Wardell  
Director  
Montana Office

cc: Larry Svoboda/Connie Collins, EPA, 8EPR-N, Denver